

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KPM ANALYTICS NORTH AMERICA
CORPORATION,

Plaintiff,

v.

BLUE SUN SCIENTIFIC, LLC, THE
INNOVATIVE TECHNOLOGIES GROUP &
CO., LTD., ARNOLD EILERT, MICHELLE
GAJEWSKI, ROBERT GAJEWSKI,
RACHAEL GLENISTER, GREGORY
ISRAELSON, IRVIN LUCAS, AND PHILLIP
OSSOWSKI,

Defendants.

CIVIL ACTION NO. 4:21-CV-10572-LTS

**ASSENTED-TO MOTION TO EXTEND THE DEADLINES REGARDING
DEFENDANTS' MOTION TO DISSOLVE OR MODIFY THE PRELIMINARY
INJUNCTION**

Plaintiff, KPM Analytics North America Corporation (“KPM”) hereby moves to briefly extend the time within which it has to oppose the Defendants’ Motion to Dissolve or Modify the Preliminary Injunction from September 7, 2022, to and including September 19, 2022. In support whereof, KPM notes that September 19, 2022 is already the deadline for KPM’s separate opposition to the Defendant, The Innovative Technologies Group, Co., Ltd.’s Motion for Summary Judgment. Synchronizing the timing of both oppositions, and any replies thereto, will be beneficial for all parties and likely efficient for the Court. The deadline to file any reply to the opposition would then move to September 26, 2022. In further support, the Defendants assent to this Motion.

WHEREFORE, KPM requests that this Honorable Court extend the time within which it has to oppose the Defendants’ Motion to Dissolve or Modify the Preliminary Injunction to and including September 19, 2022 and any reply to and including September 26, 2022.

Dated: September 1, 2022

Respectfully submitted,

KPM Analytics North America Corporation,

By its attorneys,

/s/ John T. Gutkoski

John T. Gutkoski (BBO No. 567182)
Cesari & McKenna LLP
One Liberty Square, Suite 310
Boston, MA 02109
Phone: (617) 951-2500
JTG@c-m.com

AND

Scott R. Magee (BBO No. 664067)
Paige Zacharakis (BBO No. 699108)
Morse, Barnes-Brown & Pendleton, P.C.
480 Totten Pond Road, 4th Floor
Waltham, MA 02451
Phone: (781) 622-5930
Fax: (781) 622-5933
smagee@morse.law
pzacharakis@morse.law

LOCAL RULE 7.1 CERTIFICATE

I, John T. Gutkoski, counsel for Plaintiff, KPM Analytics North America Corporation, hereby certify that on August 31, 2022 I conferred in good faith with counsel for the Defendants regarding the issues raised by this Motion and Defense Counsel indicated that they assented to the allowance of the Motion.

/s/ John T. Gutkoski

John Gutkoski

CERTIFICATE OF SERVICE

I, Paige K. Zacharakis, hereby certify that this document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and PDF copies will be sent to those indicated as non-registered participants on September 1, 2022.

/s/ Paige K. Zacharakis

Paige K. Zacharakis